

Carol A Sobel SBN 84483
Weston Rowland SBN 327599
Law Office of Carol A. Sobel
2632 Wilshire Boulevard, #552
Santa Monica, CA 90403
t. (310) 393-3055
e. carolsobellaw@gmail.com
e. rowland.weston@gmail.com

David Loy SBN 229235
Aaron R. Field SBN 310648
First Amendment Coalition
534 4th St., Suite B
San Rafael, CA 94901
t.(415) 460-5060
e. dloy@firstamendmentcoalition.org
e. afield@firstamendmentcoalition.org

Peter Bibring SBN 223981
Law Office of Peter Bibring
2140 W Sunset Blvd # 203,
Los Angeles, CA 90026
t.(213) 471-2022
e. peter@bibringlaw.com

Paul Hoffman, SBN 71244
Michael Seplow, SBN 150183
John Washington, SBN 315991
Schonbrun, Seplow, Harris, Hoffman
& Zeldes LLP
200 Pier Avenue #226
Hermosa Beach, California 90254
t.(310) 396-0731
e. hoffpaul@aol.com
e. msepflow@sshhzlaw.com
e. jwashington@sshhlaw.com

Susan E Seager SBN 204824
Law Office of Susan Seager
128 N. Fair Oaks Avenue
Pasadena, CA 91103
t. (310) 890-8991
e. susanseager1999@gmail.com

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

LOS ANGELES PRESS CLUB,
STATUS COUP,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a municipal
entity, JIM MCDONNELL, LAPD
CHIEF, sued in his official capacity;

DEFENDANTS.

Case No. 2:25-CV-05423-HDV-E

HON. HERNÁN D. VERA

**VOLUME EIGHT OF PLAINTIFFS’
EXHIBITS TO’ EX PARTE
APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE RE
PRELIMINARY INJUNCTION**

Exhibit 27



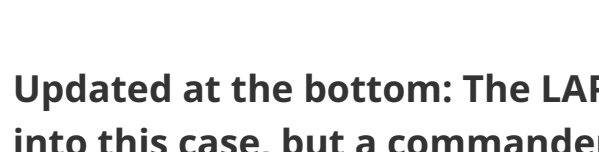
FOOD MUSIC ENTERTAINMENT ARTS CULTURE CANNABIS

LA WEEKLY

Milam's about to charge.; Credit: YouTube

OCCUPY LA: LAPD INVESTIGATES CAUGHT-ON-VIDEO ARREST OF JOURNALIST CALVIN MILAM

DENNIS ROMERO × DECEMBER 12, 2011



Updated at the bottom: The LAPD has opened an investigation into this case, but a commander disputes Mark Geragos' take on what happened to his client that night.

The arrest of a journalist for alleged failure to disperse at Occupy L.A. last month was caught on tape, and video seems to contradict what police said about the situation.

Misreading a media blog follow-up about the arrest, we [erroneously stated the reporter for City News Service is female](#). The arrestee in question is Calvin Milam, a respected reporter and sometime editor for the service.

When we broke the story of the arrest, cops told us the suspect appeared to be possibly drunk and belligerent and did not identify himself as a member of the press. Video posted to [The Occupied Venice Journal](#) and echoed at [The City Maven](#) seems to contradict that:

You can see Milam's arrest at the 3:22 mark.



Milam appears to clearly show officers his press credentials as he argues with officers. It appears he's trying to ... disperse. He finally blows through a skirmish line and is quickly tackled and arrested.

The City Maven reports that Milam has been offered its [Alternative Prosecution Program](#), which would allow him to take a class in exchange for a withholding of prosecution.

However, the blog notes that he has retained famed attorney Mark Geragos, who says, "We're certainly not going to take this lying down:"

" ... The video is completely at odds with the accounts I've been told orally (by the LAPD and City Attorney's Office) ...

Police told the *Weekly* Milam, 50, appeared to be part of the occupation, did not appear to be on-duty as a reporter, and did not identify himself as a journalist. Arrest records claim he "refused" to give his occupation.

We checked both county jail and arrest records and could not find Milam's name (his first name ended up being listed differently), leading to our own confusion about which CNS reporter was arrested. CNS' top editor did not return a call seeking comment.

City News Service is a fee-based subscription operation that provides Associated Press-style content to other news outlets in Southern California, including this one. This reporter worked there briefly about 10 years ago.

Remarkably, Milam's byline is found on coverage of the Occupy raid well into the morning of Nov. 30, with his last bylined piece on the raid appearing at 10:19 a.m. that day.

We made calls to Geragos and LAPD Commander Andrew Smith seeking comment.

[Added]: Geragos got back to us. He said police told him the same story they told the *Weekly* and that ...

They patently lied about the whole thing. It's clear to me. I was told the exact same thing. It's fortunate there's a video which shows what really happened.

Asked if Milam was trying to disperse, Geragos said there had been "no unlawful assembly declared" yet when he was arrested. "You don't even have to get to that point.

The code is predicated on unlawful assembly being declared."

He said that, as a working journalist, Milam did have a special right to be in the area and observe the police.

He said allegations that Milam was possibly drunk and belligerent were untrue:

They have now told you two things that are demonstrably false. One, that he didn't show his press credential. And two, that he was drunk. This guy hasn't touched a drink in 20 years.

Were cops concocting a story in an overreaching move at ass-covering, as they've been known to do?

That I can't even begin to fathom. I don't understand why a reporter from the one news service embedded in the LAPD (City News Service) mans the LAPD press room 24 hours a day and has for decades) would be treated this outrageously.

(Indeed, an LAPD rep asked us if someone working for CNS would even be considered a full-on journalist.)

"This one is completely over the top," Geragos said.

[Update at 4:08 p.m.]: LAPD Commander Andrew Smith tells us Milam's case was added today to an internal investigation of complaints against officers who had contact with protesters during the raid.

"We've initiated a personnel complaint, and that will be conducted by internal affairs," he said.

Smith argues that even if Milam showed his press credentials to the officers that he allegedly disobeyed their orders by moving through the skirmish line.

"That guy chose to charge through a police line after having been told not to," Smith said. " ... He would be subject ot arrest just like anybody else."

The commander disputed Geragos claim that an unlawful assembly had yet to be declared when the arrest happened. In fact, Smith said, "It may have occurred after everybody there was technically under arrest. We gave people 10 minutes to leave."

And he said that being a member of the press did not give Milam any additional rights to be behind the skirmish line, although other reporters, particularly pool journalists, were allowed behind officers as they took action in other areas of the park that night.

"Even members of the media are subject to arrest," Smith said.

He said the arrest happened on Spring Street when Milam headed west through the skirmish line, and after people were told to leave via other directions (namely north and south). "He was free to leave any other way," Smith said.

The case would be investigated alongside about 16 total complaints of officer misconduct that morning, Smith said.

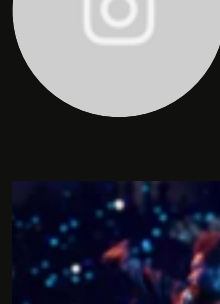
[Added]: Milam was one of about three journalists, including [Yasha Levine](#) and photog [Tyson Heder](#), arrested during the Nov. 30 raid.

Other notable arrestees include [Arthur S. Rodriguez](#), grandson of Cesar Chavez, and [Patrick Meighan](#), a writer for the hit animated comedy show *Family Guy*.

[@dennisjromero / djromero@laweekly.com / @LAWeeklyNews]

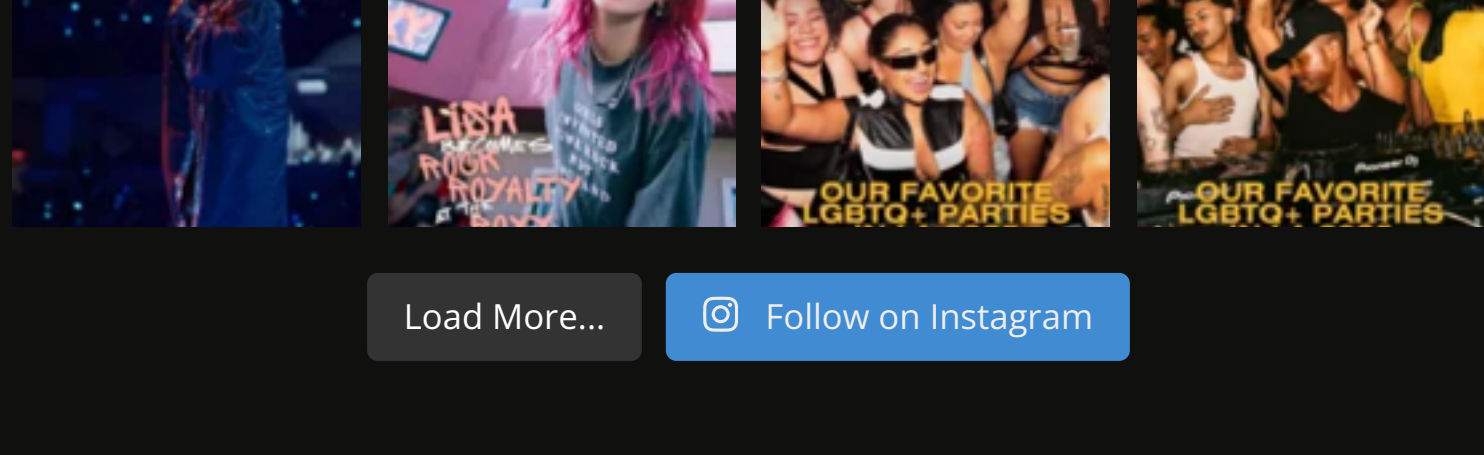
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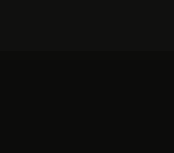
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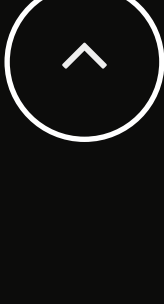


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<https://www.youtube.com/watch?v=ssFrukJE>

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Exhibit 29

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<https://www.youtube.com/watch?v=FOoeZFR9DY4> to be lodged with the court separately

Exhibit 31

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<https://www.youtube.com/watch?v=-FCmHP>

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Exhibit 32

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separately**

Exhibit 33



Exhibit 34



Exhibit 35

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<https://www.nytimes.com/video/us/politics/10000010217680/a-look-at-the-crackdown-on-the-la-protests.html> to be lodged with the
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Exhibit 37

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court separately**

Exhibit 38

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Exhibit 39

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Exhibit 40

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<https://x.com/mrolmos/status/1931881207073264118?s=46>

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Exhibit 41

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By [Scott Nover](#) and [Jeremy Barr](#)

Sergio Olmos has covered hundreds of days of protests in his career as a journalist. He estimates he's been hit dozens of times by what are known as less-lethal rounds — a broad category that includes rubber bullets, plastic bullets and pepper balls. Still, he says he's never seen police so trigger-happy with these munitions.

“It was the most amount of less-lethals I've seen used in a single day protest,” he told The Washington Post, regarding law-enforcement responses to Sunday's protests in Los Angeles against immigration raids in the area.

So, it wasn't a surprise when a Los Angeles Police Department officer shot what he believes to be a 40mm sponge grenade into his torso. “I got hit in the chest and it's a moment of, ‘What the f---?’” he said in an interview Monday. “And then I was like, ‘Oh, f---, that hurt.’” He put his camera down momentarily, to check that he was okay.

Olmos, 35, an investigative reporter for the nonprofit news organization [CalMatters](#), was in the protest crowd shooting video on his iPhone. He was at the intersection of East Temple and North Alameda streets, just blocks from a complex of federal buildings, when police shot into the crowd and hit him. In a video [posted on X](#) and provided to The Post, an LAPD officer appears to raise his firearm and point it at the crowd. When Olmos is hit, he drops his phone momentarily.

Olmos said police were routinely firing into crowds as a method of moving them back. The LAPD did not respond to a request for comment about the incident.

On Tuesday, CNN said in a statement that one of its reporting teams was briefly detained in Los Angeles — but the situation was quickly resolved after they presented their media credentials.

Olmos isn't alone. Estimates vary on how many journalists have been injured by police projectiles since the protests began — the Committee to Protect Journalists put the number at “more than 20,” while another press freedom group, Reporters Without Borders, estimated at least 27. Social media platforms

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unconstitutional act.”

Lauren Tomasi, a correspondent for 9News in Australia, was shot in the leg with a less-lethal round while filming a live television news segment Sunday. Nora Benavidez, senior counsel at the advocacy group Free Press, said it's “one of the most explicit visual examples I've ever seen in my career of retaliation by the government directly against journalists for them doing their job protected by the First Amendment.”

Protest videos are chaotic, Benavidez added. “But this was a press video clip of her covering the situation, panning the [TV] camera through the scene as she's describing it. And the moment that law enforcement sees her doing her constitutionally protected job, they target her. That, right there, is a sign of the times.”

“It's incredibly concerning to see the use of force in the L.A. protests and the way that it's impacting journalists' ability to document the protests safely,” said Katherine Jacobsen, who serves as U.S., Canada and Caribbean program coordinator for the Committee to Protect Journalists.

In the incidents, Jacobsen said she sees echoes of 2020, when scores of journalists were hit by projectiles and injured while covering nationwide protests in the aftermath of the killing of George Floyd. A freelance photojournalist, Linda Tirado, was hit in the face by a foam bullet and lost sight in her left eye while covering protests in Minneapolis.

“It's important not to extrapolate that this might turn into something like what we saw in 2020 and to kind of get ahead of ourselves, but at the same time it's very, very difficult not to reflect on the patterns we're seeing, as far as the use of force in these types of situations, and the way that it adversely affects journalists' ability to safely do their jobs,” Jacobson said.

At the time, in late May 2020, a British photojournalist named Nick Stern said he was hit by multiple rubber bullets fired by LAPD officers and struck by batons. He ultimately settled a lawsuit he filed against the city for \$150,000. On Saturday, Stern was again injured during protests in L.A. and underwent surgery to remove a plastic bullet. “There was something hard sticking out of the back of my leg and my leg was getting wet from blood,” he told the BBC.

A New York Times reporter was also hit Sunday with a rubber bullet, the newspaper reported: “The reporter was treated at a hospital but not seriously injured.” (The Times did not provide additional comment on the incident, when asked.)

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She likened her injury Friday to being “punched really hard in the leg.” On Saturday, “that one felt like someone threw a baseball at my head,” she said.

@ryannemena.bsky.social

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10:01 AM · Jun 7, 2025



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Mena, 29, said she has spoken with about a dozen other journalists who have sustained injuries from less-lethal projectiles.

She hoped to continue covering protests Monday night, but decided she first needs a doctor to check her for possible head trauma. “People are very angry, and I want to tell stories about that and amplify those voices,” she said. But, she added, “I’d like to be medically cleared before I go.”

Sean Beckner-Carmitchel, a 38-year-old freelance reporter, was on assignment for LA Public Press in Paramount, California, on Saturday when he was struck in the head by what he believed to be a teargas canister. The munition exploded and covered him in particulate matter, temporarily blinding him. “I

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Several journalists who were hit, including Beckner-Carmitchel, Olmos, Stern and Mena, say they were wearing clearly identifiable press passes at the time — which Jacobsen, of CPJ, said could be seen as evidence of intentional targeting.

“I feel that it was either intentional or reckless,” Beckner-Carmitchel said.

Press advocates say that attacks on journalists — even if inadvertent — chill their First Amendment freedoms and inhibit citizens from learning about the news of the day and the actions of the government.

What readers are saying

The comments express strong disapproval of law enforcement's use of less-lethal munitions during protests, particularly when journalists are present. Many commenters believe that journalists were deliberately targeted, citing specific incidents such as the shooting of an... [Show more](#)

This summary is AI-generated. AI can make mistakes and this summary is not a replacement for reading the comments.

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Exhibit 44

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<https://www.instagram.com/reel/DKsywBRyr2u>

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Exhibit 45

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<https://www.youtube.com/watch?v=YF5yTOWzdB4&t=5477s>

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Exhibit 47



Exhibit 48





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<https://x.com/OutFrontCNN/status/1932277470075486409>

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Exhibit 50

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<https://x.com/acyn/status/1932290084164051406?s=46>

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Exhibit 51

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<https://x.com/acyn/status/193229264141852721>

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<https://www.youtube.com/watch?v=BFxwYnj52q0>

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Exhibit 53

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[https://www.youtube.com/live/NPG9zIxMUKc?
t=6985s](https://www.youtube.com/live/NPG9zIxMUKc?t=6985s)

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Exhibit 54




James Queally ✓
@jqwritesstuff.bsky.social


+ Follow


.@LAPDHQ now chasing people up Temple. The crowd is dwindling and has largely dispersed. Could've done without the officer shoving me in response to a reminder that media is exempt from the curfew. Oh well, they're just laws I guess.


June 10, 2025 at 8:59 PM  Everybody can reply


47 reposts 2 quotes 211 likes


 4

 49


 211











JusticeMustWin ABOLISH ICE @egoldman.bsky.social · 21d
KCAL reporter and crew was just told to go home by officer






 10











JusticeMustWin ABOLISH ICE @egoldman.bsky.social · 21d
Intolerable

Thank you for your important updates. Very much appreciated.





 2






Exhibit 55

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Exhibit 58

The Sydney Morning Herald

World North America [Trump's America](#)

Fourth Australian media worker struck in LA riots; press groups say journalists 'targeted'



[Angus Delaney](#)

June 11, 2025 — 3.14pm

A Channel Nine cameraman is the fourth Australian media worker harmed by law enforcement in Los Angeles, among dozens of journalists who have been injured at immigration protests, drawing widespread condemnation from press freedom groups.

The unnamed cameraman was struck in the leg with a ricocheting rubber bullet while covering the protests on Tuesday, Los Angeles time, leaving bruises.



A police officer fires a soft round near the immigration detention centre in downtown Los Angeles. AP

The cameraman was not filming at the time and had been following instructions to find shelter from law enforcement, a Nine spokesman said.

The spokesman said Nine, the owner of this masthead, is assessing the situation and is taking into account the growing number of similar incidents involving journalists in Los Angeles.

On Tuesday (AEST) the ABC's North American correspondent, Lauren Day, described being hit with tear gas as police dispersed a crowd of protesters.

"You can see why they call it tear gas: it really burns your eyes, it burns your throat," Day said during a report for ABC News.

An ABC camera operator was also shot in the chest on Tuesday with a [less-lethal bullet](#) – while wearing protective Kevlar – describing the pain like "being punched in the chest", the broadcaster reported.

A coalition of press freedom organisations sent a letter to US Secretary of Homeland Security Kristi Noem expressing concern that federal law enforcement officers had indiscriminately targeted journalists. It urged officers to show restraint.

US National Press Club president Mike Balsamo said journalists "were not caught in the crossfire – they were targeted". In a post on X, he called for the LAPD to investigate all reported incidents of reporters being targeted by police.

The Los Angeles Press Club has recorded two dozen incidents of journalists being shot with less-lethal bullets, hit with tear gas and pushed by law enforcement officers.

A *New York Times* reporter was shot with less-lethal bullets before being assessed at hospital; an *LA Daily News* reporter was tear-gassed and struck with pepper balls; and British freelance photographer Nick Stern had emergency surgery to remove a 7.5-centimetre plastic bullet from his leg.



Protesters carried photographer Nick Stern to safety after he had been shot with a plastic bullet. AP

“There was something hard sticking out of the back of my leg and my leg was getting wet from blood,” he told the BBC. “I suddenly got this terrific pain on my leg.”

A *New York Post* photographer was shot in the head, resulting in whiplash and bruising, and CNN journalist Jason Carroll was briefly detained live on air and escorted out of a protest zone by police.

Katherine Jacobsen of the Committee to Protect Journalists said the organisation was “greatly concerned” by reports of police shooting reporters.



Illustration by Matt Golding

“Any attempt to discourage or silence media coverage by intimidating or injuring journalists should not be tolerated,” she said. “It is incumbent upon authorities to respect the media’s role of documenting issues of public interest.”

On Monday, Nine’s US correspondent [Lauren Tomasi](#) was shot with a less-lethal round as she covered the protests live on air. The LAPD is investigating.

Tomasi told Nine it was “just one of the unfortunate realities of reporting on these kinds of incidents”.

“It has been a really volatile day on the streets of Los Angeles. There have been a lot of tempers flaring here today and certainly tonight there is a lot of anger in the City of Angels.”



Nine News US correspondent Lauren Tomasi was shot by police with a rubber bullet while covering the protest. NINE NEWS

The union representing Australian journalists said Tomasi appeared to have been “deliberately shot” while speaking to the camera. Federal Greens senator Nick McKim also called it deliberate, telling *Today* it was a “cowardly act”.

Prime Minister Anthony Albanese condemned the shooting on Tuesday.

“[That was] an Australian journalist doing what journalists do at their very best ... In LA, it is not unreasonable to think that she would not have been targeted with a rubber bullet,” he said.

The Trump administration [authorised](#) the deployment of thousands of members of the National Guard and 700 marines to Los Angeles after two days of protests against federal immigration raids in the city.

The protests are now in their fifth day and Los Angeles Mayor Karen Bass has declared a local emergency in the city. She has imposed a curfew in the city’s downtown.

The Market Recap newsletter is a wrap of the day’s trading. [Get it each weekday afternoon.](#)



Angus Delaney is a trainee reporter at The Age. Connect via [email](#).

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Exhibit 60



1226







Exhibit 61

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Exhibit 62

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Exhibit 65



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Exhibit 66

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Exhibit 68

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<https://www.tiktok.com/@tastydan/video/7515974644034211118>

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Exhibit 70

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A photographer who said he was shot in the eye by a rubber bullet from police worries he may never regain his vision. Macv Jenkins reports for the NBC4

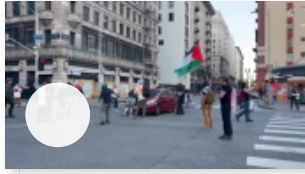
A photographer who was documenting the “No Kings” protest in downtown Los Angeles over the weekend worries he may never regain his vision after he suffered a rubber bullet to the face.



CHP

CHP officer killed in Culver City crash suffered 'medical emergency' before striking tree

Marshall Woodruff, 28, has been at Los Angeles General Medical Center recovering from his injury since Saturday. He was there when about 30,000 people descended upon LA City Hall to protest President Donald Trump and his policies.



DOWNTOWN LA • JUN 15

Protester injured by hit-and-run driver in downtown Los Angeles



DOWNTOWN LA • JUN 16

LAPD investigates law enforcement related injury during downtown LA...

"Well, it started out pretty great. You had what seemed, it seemed to be hundreds of people peacefully protesting," Woodruff said.

As the day progressed, a clash occurred between law enforcement officers and attendees. Sometime around 5 p.m., the Los Angeles Police Department lined up in formation facing the crowd.

"They came in with horses and people almost got trampled," the photographer said. "They were firing like 40 bullets in the span of like five seconds. I mean, it would – it sounded more like fireworks being rapidly shot off."

He said the rubber bullets struck his arm and his right eye.

"It sort of felt like I got slammed into the side of the head with a baseball thrown by the world's greatest pitcher," he said. "You just think to yourself, 'I need to get out.'"



LA COUNTY

'Suspected overdose' reported at Los Padrinos Juvenile Hall



LANCASTER

Transit bus with children onboard overturns after hitting railroad tracks in Lancaster

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LOS ANGELES, CA



Another overnight curfew in the downtown LA area has just ended after a weekend of protests over immigration raids. Lauren Coronado reports for the NBC4 News at 6 a.m. on June 16, 2025.

After the hit, Woodruff underwent surgery for five hours to reconstruct part of his eye.

“Even the doctors aren’t sure of just how much vision I’m going to be able to get back in my right eye,” he said. “So, it’s just been a painful process.”

LAPD declared an unlawful assembly in the area around 4 p.m. on Saturday after the department said some people began to throw bottles and rocks at officers. Woodruff said he hadn’t heard about the notice to disperse.

“What I witnessed on Saturday was unjustifiable,” he said. “And for me, I think that is a clear indication that it wasn’t the protesters that were the problem; I think it was the LAPD and how they chose to respond to the situation.”

LAPD said [three officers were hurt](#) during Saturday’s protest. It did not say how many civilians were injured.

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Exhibit 71





Exhibit 72

This exhibit is a video:

[https://bsky.app/profile/cwebbonline.com/post/3
lrndlulp522g](https://bsky.app/profile/cwebbonline.com/post/3lrndlulp522g)

To be lodged with the Court separately

Exhibit 73

AFP Photographer Shot Twice by Rubber Bullets During LA Protests

 JUN 17, 2025 MATT GROWCOOT

Members of the California National Guard stand in front of protesters.

An AFP photographer was shot in the head by a rubber bullet during the Los Angeles protests on Saturday — at least the third photographer who has been injured by less-lethal weapons since the unrest began.

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The AFP (Agence France-Presse) photographer was shot in the face and leg while covering a standoff between protesters and police in downtown L.A. Officers from the Los Angeles Police Department (LAPD) were attempting to disperse a crowd and fired their weapons. He is now recovering from his injuries.

“I was covering the protest ... approximately 90 feet away from the police when I received the impact of a rubber bullet in my face and another one in my right arm,” the photographer, who wishes to remain anonymous, [tells France 24](#). “I was working with two cameras, a helmet with AFP stickers on it and also, I had a big patch on my chest that said ‘Press.’”

While not acknowledging the incident directly, the LAPD issued a statement confirming it had attempted to clear an unlawful assembly.

“Following the dispersal order, less-lethal munitions were used to clear the area of those who refused to comply and leave the area,” the LAPD tells AFP.

The Los Angeles County Sheriff’s Department (LASD) says it is checking to see whether its personnel were involved in the incident. “The LASD does not condone any actions that intentionally target members of the press,” it adds.

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Members of the Media Keep Getting Shot

The incident is one of several where working journalists and photographers have been injured by authorities. A *New York Post* photographer [recorded himself getting shot in the head](#) by a rubber bullet while above the 101 freeway. The strike left a nasty bruise on Toby Canham's head.

That incident came after another photographer, Nick Stern, was [shot by a high-velocity sponge bullet](#) that tore through his thigh. Stern needed emergency surgery after it left his muscle exposed and surgeons found a 40mm wide and 60mm long object in his leg which he suspects was a round that consisted of a sponge nose and a plastic body.

■ ■ *The police fired rubber bullets at Australian reporter Lauren Tomasi while she was reporting live from Los Angeles today.*

Appalling and unjustified.
pic.twitter.com/QLixvXawDg

— *Republicans against Trump (@RpsAgainstTrump)* [June 9, 2025](#)

An Australian TV reporter was also struck by one of the less-lethal bullets. It was recorded on camera (above) and shows Lauren Tomasi of 9 News screaming out after an officer fired at her.

Yesterday, the [Los Angeles Times reported](#) that a coalition of press rights organizations is seeking a court order to prevent the “continuing abuse” of journalists at the hands of the police during the protest.

The L.A. protests began on June 6 and have continued daily. Anger over raids by Immigration and Customs Enforcement (ICE) fueled the protests which have been largely peaceful but at times have spiraled into rioting. Trump has sent in 3,000 National Guard and 700 Marines to the city.

Image credits: U.S. Northern Command



NEWS



AFP, AGENCEFRANCEPRESSE, LAPD, LAPROTEST, LOSANGELES, PRESSPHOTOGRAPHER, PROTESTS, RUBBERBULLETS



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DISCUSSION

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Exhibit 74

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AFP photographer recovers after being shot in face with rubber bullet at LA protest

AMERICAS

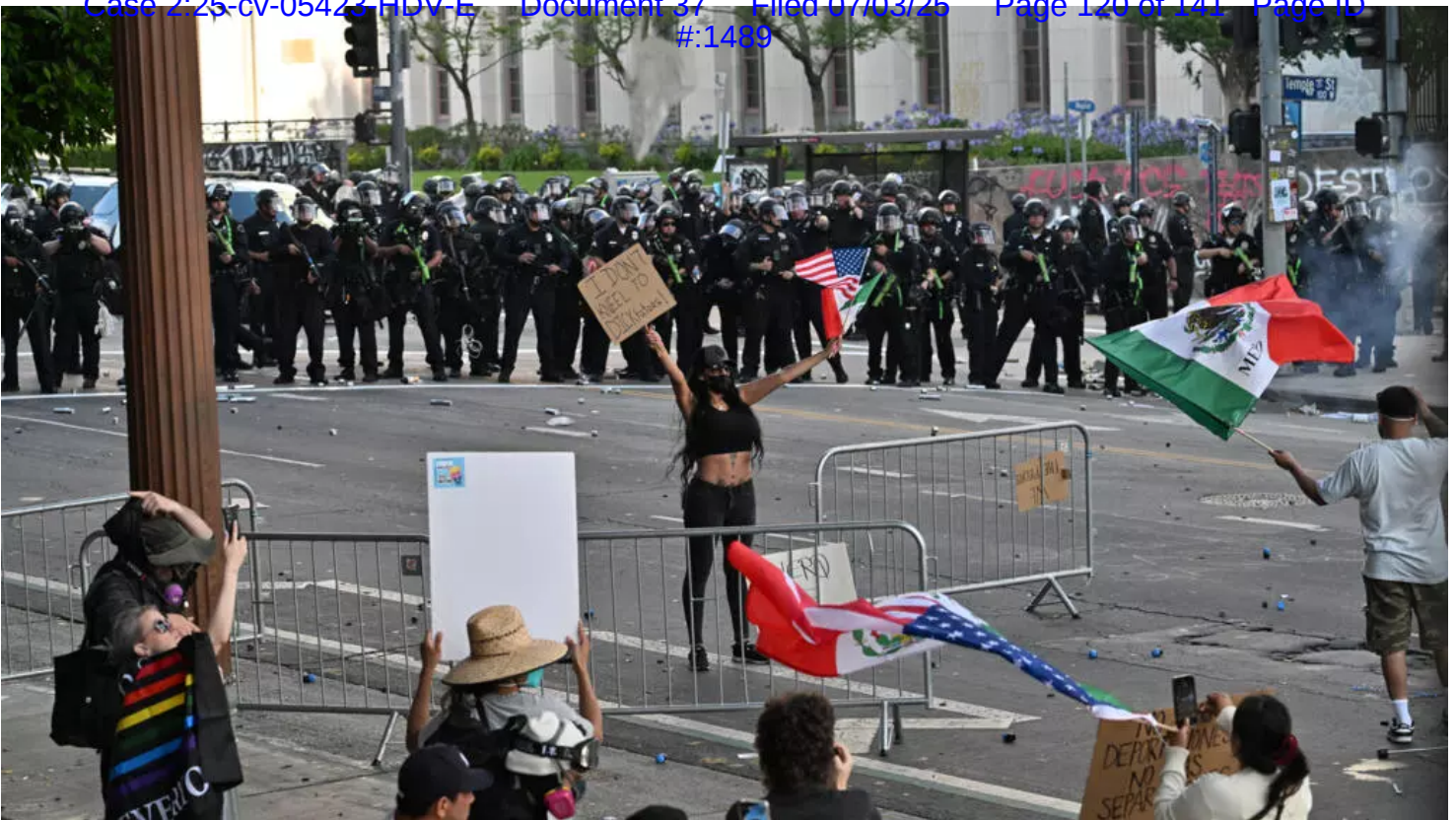
An Agence France-Presse photographer was recovering Monday after he was shot in the face with a rubber bullet by law enforcement during their standoff with protesters in downtown Los Angeles.

Issued on: 17/06/2025 - 02:59 Modified: 17/06/2025 - 02:56

2 min

By: [FRANCE 24](#) / [FRANCE 24](#)





The AFP photographer was injured as police moved to clear protesters in Los Angeles. © Robyn Beck, AFP

An Agence France-Presse photographer was recovering Monday after he was shot in the face with a rubber bullet by law enforcement during their standoff with protesters in downtown Los Angeles.

The photographer was covering demonstrations on Saturday – part of the many rallies across the country against US President Donald Trump.

He was struck twice by rubber bullets fired by authorities when they abruptly moved in to disperse protesters, and had to be treated in hospital for his injuries.

"I was covering the protest ... approximately 90 feet away from the police when I received the impact of a rubber bullet in my face and another one in my right arm," he recalled.

The photographer, who asked to remain anonymous, said he was clearly identified as a journalist.

"I was working with two cameras, a helmet with AFP stickers on it and also, I had a big

Los Angeles Police Department did not acknowledge firing at the photographer but said it had sought to clear protesters after declaring an unlawful assembly.

"Following the dispersal order, less-lethal munitions were used to clear the area of those who refused to comply and leave the area," it told AFP in a statement.

WATCH MORE

Los Angeles protests: How AI and chatbots are feeding fake news

Los Angeles County Sheriff's Department, which also policed the protest, said it was reviewing footage of the incident but added it was "not clear whether our personnel were involved".

"The LASD does not condone any actions that intentionally target members of the press," it said.

Saturday's rally was the largest of the protests that began in Los Angeles on June 6 and have continued daily ever since.

They first erupted in anger at raids by Immigration and Customs Enforcement (ICE), which has been ordered by the Trump administration to target undocumented migrants across the sprawling, heavily Latino city.

READ MORE

What ICE's armed LA raids tell us about Trump's plans for mass deportations

The demonstrations have been mostly peaceful and confined to a small section of downtown Los Angeles.

READ MORE

Marines in LA: Trump chooses strategy of escalation against anti-ICE protests

Other journalists have also been injured during the protests.

The Guardian newspaper reported that a British photographer had to undergo emergency surgery after he was shot in the leg by a non-lethal round on June 7.

Meanwhile, an Australian reporter was hit in the leg by a rubber bullet while she was reporting on live television on June 8, an incident slammed by the country's prime minister as "horrific".

And the New York Post said its photographer was shot in the head with a rubber bullet, also during the June 8 clashes.

(FRANCE 24 with AFP)

READ NEXT

Millions take to the streets in 'No Kings' anti-Trump protests across the US

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Protests over Trump's immigration raids spread across the US

AMERICAS

Exhibit 75

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JUN 19, 2025

Show of strength

Tod Seelie photographs No Kings in Los Angeles



Images: Tod Seelie

Today: [Tod Seelie](#), photographer and author of [BRIGHT NIGHTS:](#)

1271

ISSUE NO. 344

No Kings: Los Angeles

Tod Seelie

HYDRANYM No. 4: Vote!

The Editors

NO KINGS: LOS ANGELES

by TOD SEELIE

What the LAPD, Los Angeles Sheriff's Department, and California Highway Patrol lack in numbers, they make up for in sheer violence. Other cities like to kettle protesters and do mass arrests. The LAPD would rather shoot you in the head with a less-lethal projectile and hope you don't come back next time. Announcements to disperse come at a whisper volume, followed by a lot of tear gas.

I'm not saying the cruelty is the point. But it's certainly a feature, more than it's a bug. Los Angeles protests have always been a wild mix of chaos and levity, violence and boredom, occasionally tilting into the surreal and dangerous.

I covered L.A.'s No Kings protest on June 14th wearing a helmet with a press

Case 2:25-cv-05423-HDV-E Document 37 Filed 07/03/25 Page 126 of 141 Page ID
badge on it and my media credentials #1495. I was tear-gassed multiple times, shot in
the leg with a projectile, shoved almost to the ground by the LAPD, and
shoved to the ground by protesters objecting to photography. Other journalists
fared far worse than I did.

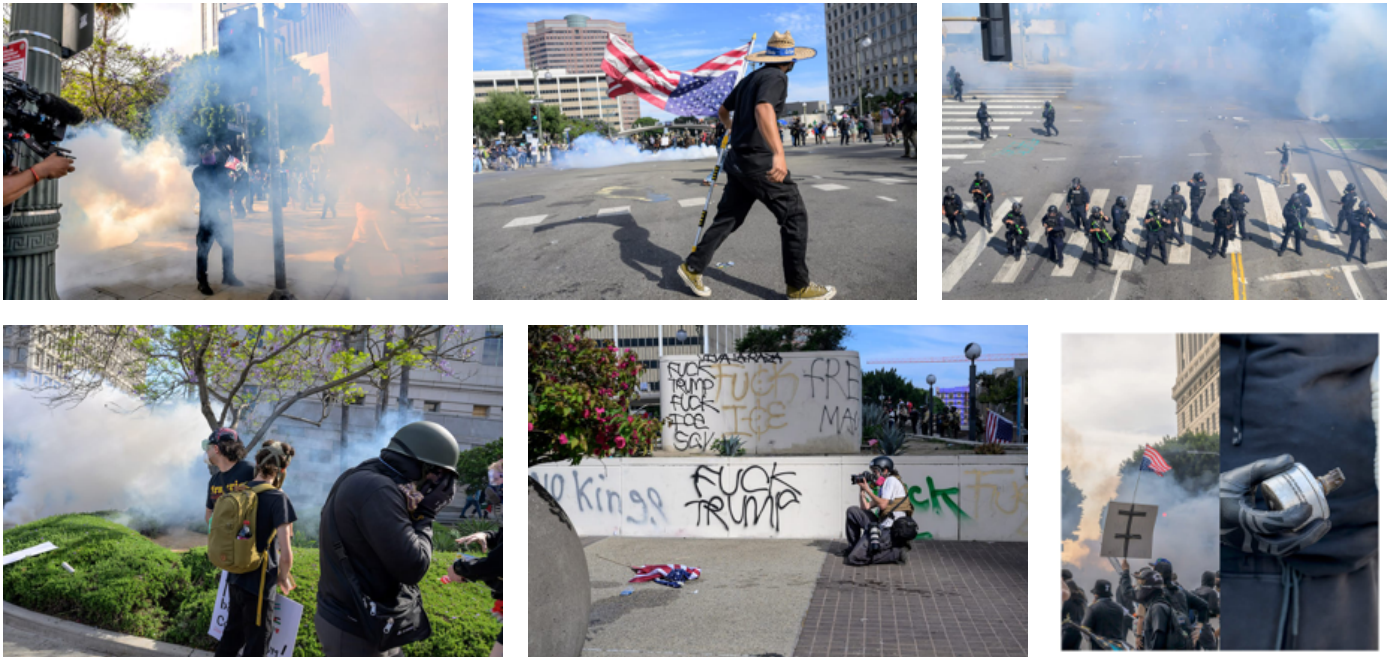


Photos: Tod Seelie





Photos: Tod Seelie



Photos: Tod Seelie





Photos: Tod Seelie

HAPPY JUNETEENTH TO ALL



your wife's tennis coach

@milesklee.bsky.social

congratulations mister vice president



J.D. Vance Joins Bluesky, Immediately Becomes Most Blocked Account on App

Vice President J.D. Vance trolled the transgender community in his first Bluesky posts and was soon the most blocked account on the site.

www.rollingstone.com

Miles Klee

Exhibit 76

This exhibit is a video:

[https://x.com/Channel5iveNews/status/1932497
835288560088](https://x.com/Channel5iveNews/status/1932497835288560088)

To be lodged with the Court separately

Exhibit 77

This exhibit is a video:

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This exhibit is a video:

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GhhZ3d0Zmc=](https://www.instagram.com/reel/DK5lXdvy8OP/?utm_source=ig_web_copy_link&igsh=c3U0ZGhhZ3d0Zmc=)

To be lodged with the Court separately

Exhibit 79



Fri 10/30/2020 11:38 AM

DOC Communications Division

Media

To  DOC Communications Division

To All Department Personnel:

Protests and demonstrations are occurring daily in Los Angeles as well as other cities across the Nation. Some of those public gatherings have involved instances of civil disobedience. Others have devolved into acts of violence against our personnel, vandalism, arson and looting. Media representatives have a legitimate interest in providing the public with information on these events. Existing Department policy provides specific guidelines regarding media representative access to closed areas, as well as providing a safe designated area for media purposes.

The intent of this message is to remind supervisors and line personnel that the Department WILL recognize individuals who self-identify as media representatives and will NOT require specific media credentials. Public Communications Group and Media Relations Division have been in communication with the Radio Television News Association to discuss acceptable conduct during protests, while this organization does not represent every news entity, they do provide a communication conduit for many journalists in the area. There was shared agreement that media should seek to identify themselves to an officer or supervisor at an incident. While officers can ask individuals who identify themselves as a member of the media, for identification from the organization they represent, which may consist of a business card or company ID, **the inability to produce identification does not preclude an individual from acting as a member of the media.**

When an unlawful assembly has been declared and a dispersal order has been given, the Incident Commander (IC) and PIO representative will establish a safe working area for members of the media. Officers are reminded that media representatives may be allowed behind skirmish lines but may not move back and forth through police lines or otherwise interfere with police actions.

As always, the decision to assume any risk of danger involved in covering a public event remains with the individual news reporter making such decision; however, any such decision does not constitute a waiver by a reporter of any constitutional or other legal rights.

If there are any questions please contact Media Relations Division at [213-486-5910](tel:213-486-5910)

DOMINICH. CHOI, Deputy Chief
Chief of Staff
Office of the Chief of Police

Exhibit 80

INTRADEPARTMENTAL CORRESPONDENCE

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DEC 09 2021

POLICE COMMISSION

December 8, 2021
1.14

TO: The Honorable Board of Police Commissioners

REVIEWED BY
MICHAEL R. MOORE
RICHARD M. TEFANK
EXECUTIVE DIRECTOR
DATE

FROM: Chief of Police

SUBJECT: ASSEMBLY BILL 48 – USE OF KINETIC ENERGY PROJECTILES AND
CHEMICAL AGENTS; AND, SENATE BILL 98 – MEDIA ACCESS TO
CLOSED AREAS – ASSEMBLIES, PROTESTS AND DEMONSTRATIONS

RECOMMENDED ACTION

It is recommended that the Board of Police Commissioners REVIEW and APPROVE the newly established Notice regarding the use of kinetic energy projectiles and chemical agents, as well as news media access, during crowd control situations.

DISCUSSION

On January 1, 2022, Assembly Bill (AB) 48 and Senate Bill (SB) 98 become effective. Assembly Bill 48 prohibits the use of kinetic energy projectiles or chemical agents by law enforcement at assemblies, protests, and demonstrations unless certain specified criteria are met. Senate Bill 98 requires law enforcement to allow the media access to command posts, behind police lines, or other rolling closures at assemblies, protests, demonstrations, rallies, marches or where individuals are engaged in other constitutionally protected activities. The Notice delineates the specific procedures pertaining to kinetic energy projectiles and chemical agents, as well as media access, pursuant to the new legislation.

Should you have additional questions regarding this matter, please contact Director Lizabeth Rhodes, Office of Constitutional Policing and Policy, at (213) 486-8730.

Respectfully,


MICHEL R. MOORE
Chief of Police

Attachment

OFFICE OF THE CHIEF OF POLICE

NOTICE

1.14

TO: All Department Personnel

FROM: Chief of Police

SUBJECT: ASSEMBLY BILL 48 – USE OF KINETIC ENERGY PROJECTILES AND CHEMICAL AGENTS; AND, SENATE BILL 98 – MEDIA ACCESS TO CLOSED AREAS – ASSEMBLIES, PROTESTS AND DEMONSTRATIONS

On January 1, 2022, Assembly Bill (AB) 48 and Senate Bill (SB) 98 become effective. Assembly Bill 48 prohibits the use of kinetic energy projectiles or chemical agents by law enforcement at assemblies, protests, and demonstrations unless certain specified criteria are met. Senate Bill 98 requires law enforcement to allow duly authorized representatives of the media access to command posts, behind police lines, or other rolling closures at assemblies, protests, demonstrations, rallies, marches, or where individuals are engaged in First Amendment activities. The purpose of this Notice is to delineate the specific procedures pertaining to kinetic energy projectiles and chemical agents, as well as media access, pursuant to the new legislation.

Kinetic Energy Projectiles and Chemical Agents

Per AB 48, kinetic energy projectiles and chemical agents [i.e., 37mm Less-Lethal Launcher, 40mm Less-Lethal Launcher, Oleoresin Capsicum (OC Spray)] shall not be used solely due to an imposed curfew, verbal threat, or non-compliance with a Department directive. Further, if kinetic energy projectiles or chemical agents are used during assemblies, protests, or demonstrations, they shall only be used to defend against a threat to life or serious bodily injury to any individual, including a peace officer, or to bring an objectively dangerous and unlawful situation safely and effectively under control, **and**, in accordance with the following requirements:

- De-escalation techniques or other alternatives to force have been attempted when objectively reasonable, and have failed;
- Repeated audible announcements have been made stating the intent to use kinetic energy projectiles or chemical agents, when objectively reasonable to do so (in multiple languages and from various locations, if appropriate);
- Persons have been given an objectively reasonable opportunity to disperse and leave the scene;
- An objectively reasonable effort has been made to identify persons engaged in violent acts and those who are not. Kinetic energy projectiles and chemical agents shall not be used indiscriminately on a crowd or group of persons, and shall instead be targeted toward those individuals engaged in violent acts;

All Department Personnel

Page 2

1.14

- Kinetic energy projectiles and chemical agents shall only be used as objectively reasonable, and only with the frequency, intensity, and in a manner that is proportional to the threat;
- Officers shall minimize the possible incidental impact of the use of kinetic energy projectiles and chemical agents on bystanders, medical personnel, journalists, or other unintended targets;
- An objectively reasonable effort has been made to extract individuals in distress;
- Medical assistance is promptly requested and, if properly trained personnel are present, to provide such assistance to injured persons, when it is reasonable and safe to do so; and,
- Kinetic energy projectiles shall not be aimed at the head, neck, or other vital organs.

If kinetic energy projectiles or chemical agents are used during assemblies, protests, or demonstrations, the Department shall, within 60 days of each incident, publish a summary of the incident on the Department's public webpage. The summary shall include only the following information:

- A description of the assembly, protest, demonstration or incident, including the approximate crowd size and number of officers involved;
- The type of kinetic energy or chemical agent used;
- The number of rounds used or quantity of chemical agent dispersed;
- The number of documented injuries as a result of the use of kinetic energy projectiles or chemical agent; and,
- The justification for using kinetic energy projectiles or chemical agents, including any de-escalation efforts or protocols, and other measures taken to avoid the necessity of using the kinetic energy projectiles or chemical agent.

Note: Assembly Bill 48 permits the Department to extend the 60-day period for another 30 days if it demonstrates good cause; however, in no case longer than 90 days from the time of the incident.

Note: Although the use of a beanbag shotgun is not prohibited by AB 48, Department personnel **shall not** use a beanbag shotgun during crowd control situations (see Office of the Chief of Police Notice dated September 28, 2021, entitled *Prohibition on the Use of the Beanbag Shotgun in a Crowd Control Situation*).

Media Access to Closed Areas

Duly Authorized Representatives of the Media. Those persons possessing current, valid credentials issued by the Department or other bona fide law enforcement agency, or other identification establishing duly authorized representation of news media affiliation or employment.

Note: "Freelance" reporters or photographers possessing a valid media credential or other identification establishing duly authorized news media affiliation or primary employment shall be deemed as authorized news media representatives.

All Department Personnel

Page 3

1.14

As per SB 98, if officers close the immediate area surrounding any emergency field command post or other area, police line, skirmish line, or other rolling closure at any demonstration, march, protest, rally, or where individuals are primarily engaged in any activity that is protected by the First Amendment to the United States Constitution or Article I of the California Constitution, the following requirements shall apply:

- A duly authorized representative of the media shall include any member of a news service, online news service, newspaper, or radio or television station or network; and those persons may enter the closed area;
- Officers shall not intentionally assault, interfere with, or obstruct the duly authorized representative of the media who is gathering, receiving, or processing information for communication to the public;

Note: The Department may restrict access to a command post (i.e., the area where incident-specific information is being shared by public safety personnel, strategic decisions are being made, or deliberations are ongoing), or crime scenes for the purpose of the preservation of evidence.

- A duly authorized representative of the media who is in a closed area described above shall not be cited for failure to disperse, a violation of curfew, or other violation of paragraph (1) of subdivision (a) of California Penal Code Section 148, for gathering, receiving or processing information; and,
- If a duly authorized representative of the media is detained, that member of the media shall be permitted to contact a Department supervisor immediately to challenge the detention, unless circumstances make it impossible to do so.

Note: Nothing precludes officers from enforcing other applicable laws if the member of the media is engaged in activity that is otherwise unlawful or is interfering with official law enforcement duties including, but not limited to, collecting evidence and making arrests.

This Notice supersedes any previous publications, directives, or guides regarding to the use of kinetic energy projectiles and chemical agents, as well as news media access, as it pertains to the provisions of AB 48 and SB 98. The Department Emergency Operations Guide and Media Relations Handbook will be updated accordingly as it pertains to this Notice.

Should you have any questions regarding this Notice, please contact the Office of Constitutional Policing and Policy, at (213) 486-8730.



MICHEL R. MOORE
Chief of Police

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